

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the remarks and amendments herewith. The present Response is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1, 2, 7-9, 12-14, 23, 24, 28-31, 34-36, 45-47 and 49 are pending. Claims 1, 2, 9, 12, 23, 24, 28, 31, 34, 45-47 and 49, which are independent, are hereby amended. No new matter has been added. Support for this amendment is provided throughout the Specification as originally filed. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112 beyond the remarks. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-2, 7, 9, 12, 13, 23-24, 28, 29, 31, 34, 35, 45-47 and 49 were rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,195,090 to Riggins, III (hereinafter, merely "Riggins") in view of U.S. Publication No. 2002/0090217 to Limor et al. (hereinafter, merely "Limor").

Claims 8, 14, 30 and 36 were rejected under 35 U.S.C. §103(a) over Riggins in view of Limor and further in view of US 2005/0198668 A1 to Yuen, et al. (hereinafter, merely "Yuen").

### III. RESPONSE TO REJECTIONS

Claim 1 recites, *inter alia*:

...a display for displaying a plurality of modes and a plurality of display objects,

wherein each of the plurality of display objects is related to the selection of one of the plurality of modes,

wherein when one of the display objects is selected, the related mode is displayed,

wherein each of the plurality of display objects related to the selection of each of the plurality of modes for display purposes are all displayed simultaneously, and

wherein **plurality of modes comprising:**

**a mode for displaying a specific object chasing function,**

**a mode for displaying a view from a specific camera,**

**a mode for displaying specific profile information, and**

**a mode for mapping positions of a plurality of movable bodies on the map and displaying a positional relationship between the movable bodies on the screen as a function of the multiplexing processing section,**

**wherein the display objects related to the selection of each of the plurality of modes for display purposes are all display simultaneously,**

wherein, when a specific object chasing function is selected, the display maps the positions of the specific object and plurality of movable bodies on the map, matches identification information of the specific object, and determines whether an image of an apparatus is showing the specific object,

wherein, if the specific object chasing function determines that the specific object is included in the image of an

imaging apparatus, the image of the imaging apparatus is selected,

wherein, if the specific object chasing function determines that the specific object is not included in the image of an imaging apparatus, the specific object chasing function estimates which imaging apparatus will show the specific object next, and selects the imaging apparatus that will show the specific object next.

Support for the above-identified features is provided at paragraph [0150]-[0152]

of the Specification as originally filed, which are reproduced below:

[0150] FIG. 11 is an example of a screen displayed in the case where mode selection is selected by a remote controller and the like. The information of the screen is stored in the mode selection screen memory section 54. As described above, FIG. 11 shows a screen for a car race, but it is desirable that several kinds of mode selection screen information are stored in the mode selection screen memory section 54 in order that selection buttons suitable for each event should be displayed. However, it is also possible to adopt such a form that a service provider who provides the program prepares these mode selection screens to transmit the prepared mode selection screens after multiplexing them on a digital broadcast signal. Because, in this case, buttons suitable for the programs may be prepared, the operability of a viewer is improved.

[0151] As for the display position of mode items 80 in the mode selection screen, in case of FIG. 11, the mode items 80 in a shape of a button are displayed at a lower column in the screen lest they hinder the display of images. It is needless to say that their display position may be an upper column in the screen, or may be the left side or the right side in the screen. Moreover, it may also be displayed at the center of the screen.

[0152] The mode items 80 prepared in FIG. 11 are four: a map 81, a driver 82, a camera 83 and a profile 84. Now, the map 81 is an item to be used for displaying a screen generated by the mapping of the positions of movable bodies or imaging cameras on a map at a prescribed region on the screen (the right side region in the screen in case of

FIG. 12). The driver 82 is an item prepared for the chase and display of a specific vehicle. In the case where the item was selected, the images of imaging cameras output to the monitor 61 are automatically switched. The camera 83 is a button used for displaying selectively images imaged by a specific fixed camera. The button is convenient to select a desired image after the ascertainment of the positions of the movable bodies and the imaging cameras on a map. The profile 84 is a button used for the looking of the information that concerns drivers and vehicles and was previously multiplied on a digital broadcast signal by the program provider in advance.

Claim 1 recites **“the plurality of modes comprising: a mode for displaying a specific object chasing function, a mode for displaying a view from a specific camera, a mode for displaying specific profile information, and a mode for mapping positions of a plurality of movable bodies on the map and displaying a positional relationship between the movable bodies on the screen as a function of the multiplexing processing section, wherein the display objects related to the selection of each of the plurality of modes for display purposes are all display simultaneously”**

The Office Action concedes that Riggins, Limor, and Koehler, taken alone or in combination, fail to teach, suggest or render predictable the above identified features of claim 1. The Office Action relies on Suzuki, specifically Figure 4, element 68 and Column 8, lines 39-58, to teach the above-identified example.

Applicants submit that Suzuki does not teach a display for displaying a plurality of modes and a plurality of display objects, wherein each of the plurality of display objects is related to the selection of one of the plurality of modes, wherein when one of the display objects is selected, the related mode is displayed, wherein each of the plurality of display objects related to the selection of each of the plurality of modes for display purposes are all displayed

simultaneously, and wherein **the plurality of modes comprising: a mode for displaying a specific object chasing function, a mode for displaying a view from a specific camera, a mode for displaying specific profile information, and a mode for mapping positions of a plurality of movable bodies on the map and displaying a positional relationship between the movable bodies on the screen as a function of the multiplexing processing section."**

Suzuki **does not** teach a plurality of modes for display purposes.

Suzuki **does** teach that a plurality of camera angles can be viewed.

Figure 4, element 68 of Suzuki shows a list of locations where cameras are located, and from which the user can choose to view. Suzuki does not show that a user may choose a mode for display purposes, (e.g. a mode where the user views the scene from one camera, as opposed to a mode where a user chooses to view a specific object and therefore, the camera used to feed the information to the user changes as the object moves.)

Even assuming *arguendo* that the list of camera views (element 69 of Figure) does represent a plurality of modes, Koehler DOES NOT teach specific modes, as recited in Claim 1:

**(1) a mode for displaying a specific object chasing function;**  
**(2) a mode for displaying a view from a specific camera;**  
**(3) a mode for displaying specific profile information; and**  
**(4) a mode for mapping positions of a plurality of movable bodies on the map and displaying a positional relationship between the movable bodies on the screen as a function of the multiplexing processing section.**

Therefore, Applicants submit that independent claim 1 is patentable.

For reasons similar to those described above with regard to similar recitations of independent claim 1, independent claims 2, 9, 12, 23, 24, 28, 31, 34, 45-47 and 49 are patentable.

#### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

#### **CONCLUSION**


Similarly, because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,  
FROMMER LAWRENCE & HAUG LLP  
Attorneys for Applicants

By   
William S. Frommer  
Reg. No. 25,506  
(212) 588-0800